

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,

Plaintiff,

v.

FELICIA FRANKLIN, in her
individual and official capacities;
ALIEKA ANDERSON, in her
individual and official capacities;
GAIL HAMBRICK, in her
individual and official capacities;
and CLAYTON COUNTY,
GEORGIA,

Defendants.

Civil Action Number:
1:22-CV-04149-WMR

**DEFENDANT FELICIA FRANKLIN’S MOTION FOR JUDGMENT ON
THE PLEADINGS**

COMES NOW Defendant FELICIA FRANKLIN (hereinafter “Franklin”), in both her individual and official capacities, by and through her undersigned counsel, and hereby files this Motion for Judgment on the Pleadings pursuant to Federal Rule of Civil Procedure 12(c). The basis for the motion is set forth in the accompanying brief in support of the motion.

Submitted this 3rd day of March, 2023.

s/ Melissa A. Tracy

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CERTIFICATE OF COMPLIANCE

I hereby certify that the within and foregoing has been prepared in compliance
with Local Rule 5.1(B) in 14-point Times New Roman type face.

/s/ Melissa A. Tracy
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CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing **DEFENDANT FELICIA FRANKLIN'S MOTION FOR JUDGMENT ON THE PLEADINGS** in the above-styled civil action with the Clerk of Court by using the Court's CM/ECF system, which will automatically send notice of same to the attorneys of record. Additionally, a true and correct copy of same has been delivered to the following counsel of record:

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This 3rd day of March, 2023.

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